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and

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Attorneys for Defendants

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ROSE ANN PAGUIRIGAN, individually and
on behalf of all others similarly situated,

Plaintiff,

-vs-

PROMPT NURSING EMPLOYMENT AGENCY
LLC d/b/a SENTOSA SERVICES,
SENTOSACARE LLC, SENTOSA NURSING
RECRUITMENT AGENCY, BENJAMIN LANDA,
BENT PHILIPSON, BERISH RUBENSTEIN a/k/a
BARRY RUBENSTEIN, FRANCIS LUYUN,
GOLDEN GATE REHABILITATION &
HEALTH CARE CENTER LLC, and SPRING
CREEK REHABILITATION AND NURSING
CENTER,

Defendants

Civil Action No.: 17-cv-01302(NG)(JO)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Elliot Hahn, dated August 31, 2018, and the exhibits annexed thereto, the Declaration of Berish Rubinstein dated

August 27, 2018, and the exhibits annexed thereto, the Statement of Material Facts pursuant to Local Rule 56.1, the accompanying Memorandum of Law, and upon all prior pleadings and proceedings in this action, Defendants Prompt Nursing Employment Agency LLC d/b/a Sentosa Services (“Prompt”), Sentosacare LLC, Sentosa Nursing Recruitment Agency, Benjamin Landa, Bent Philipson, Berish Rubenstein a/k/a Barry Rubenstein, Francis Luyun, Golden Gate Rehabilitation & Health Care Center LLC, and Spring Creek Rehabilitation and Nursing Center will move this Court, the Honorable Nina Gershon, United States District Judge, at the United States Court House, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date and at a time to be set by the Court, for an Order pursuant to Fed. R. Civ. P. 56 (i) granting summary judgement to Defendants dismissing all claims asserted against them in this action; (ii) granting summary judgment to Prompt on its counterclaims; and (ii) for such other and further relief as the Court deems just and proper.

Dated: Brooklyn, New York
August 31, 2018

HAHN EISENBERGER PLLC

By: /s/ Elliot Hahn
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